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EXHIBIT A

Proposed Order

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Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

☐ Affects PG&E Corporation

☐ Affects Pacific Gas and Electric Company

☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

Case Nos. 19-30088 (DM) (Lead Case)
(Jointly Administered)

**[PROPOSED] ORDER EXTENDING
DEADLINE FOR THE REORGANIZED
DEBTORS TO OBJECT TO CLAIMS**

1 Upon the Motion, dated October 27, 2020 (the “**Motion**”),¹ [Dkt. No. •] of PG&E
2 Corporation and Pacific Gas and Electric Company, as debtors and reorganized debtors (together,
3 the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the
4 “**Chapter 11 Cases**”), in accordance with Section 7.1 of the Plan, sections 105(a) and 1142 of title
5 11 of the United States Code (the “**Bankruptcy Code**”), and Rule 9006(b) of the Federal Rules of
6 Bankruptcy Procedure (the “**Bankruptcy Rules**”), for entry of an order extending the deadline for
7 the Reorganized Debtors to object to claims by one hundred eighty (180) days, through and
8 including June 26, 2021, without prejudice to the Reorganized Debtors’ right to seek additional
9 extensions thereof; and consideration of the Motion and the requested relief being a core proceeding
10 pursuant to 28 U.S.C. section 157(b); and venue being proper before this Court pursuant to 28 U.S.C.
11 sections 1408 and 1409; and a hearing having been held on the Motion; and the Court having found
12 and determined that notice of the Motion as provided to the parties listed therein is reasonable and
13 sufficient, and it appearing that no other or further notice need be provided; and this Court having
14 reviewed the Motion and the McWilliams Declaration submitted in support thereof; and the Court
15 having issued a tentative ruling with respect to the Motion on November 12, 2020 (the “**Tentative**
16 **Ruling**”); and the Reorganized Debtors having filing a pleading accepting the Court’s Tentative
17 Ruling subject to the limited qualification set forth therein; and this Court having determined that
18 the legal and factual bases set forth in the Motion establish just cause for the relief granted herein;
19 and it appearing that the relief requested in the Motion is in the best interests of the Debtors, their
20 estates, creditors, shareholders, and all parties in interest; and upon all of the proceedings had before
21 this Court and after due deliberation and sufficient cause appearing therefor,

22 **IT IS HEREBY ORDERED THAT:**

- 23 1. The Motion is granted as provided herein.

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26 ¹ Capitalized terms used but not herein defined have the meanings ascribed to such terms in the
27 Motion, the *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated*
28 *June 19, 2020* [Dkt. No. 8048] (as it may be amended, modified, or supplemented and together
which any exhibits or schedules thereto, the “**Plan**”), or the *Order Confirming Debtors’ and*
Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June 19, 2020 [Docket
No. 8053] (the “**Confirmation Order**”), as applicable.

1 2. The deadline for the Reorganized Debtors to object to Claims under Section 7.1 of the
2 Plan (as approved by Paragraph 31 of the Confirmation Order) is extended by one hundred eighty
3 (180) days, through and including June 26, 2021, without prejudice to the right of the Reorganized
4 Debtors to seek additional extensions thereof.

5 3. Consistent with the Plan and the Confirmation Order, the Debtors and Reorganized
6 Debtors shall have no obligation to object to Fire Victim Claims or Subrogation Wildfire Claims,
7 nor shall any such non-objection constitute an allowance or deemed allowance of any Fire Victim
8 Claim or Subrogation Wildfire Claim. Pursuant to the Plan and the Confirmation Order, all Fire
9 Victim Claims and Subrogation Wildfire Claims have been channeled to the Fire Victim Trust or
10 the Subrogation Wildfire Trust, as applicable, and shall be resolved by the applicable Fire Victim
11 Trust or Subrogation Wildfire Trust, in each case, without any recourse to or Claims whatsoever
12 against the Debtors or Reorganized Debtors or their assets and properties.

13 4. Notwithstanding the foregoing paragraphs, the deadline for the Reorganized Debtors
14 to object to United States Claims under Section 7.1 of the Plan (as approved by Paragraph 31 of the
15 Confirmation Order) is extended through and including March 31, 2021, without prejudice to the
16 right of the Reorganized Debtors to move for a further extension of such date. As used in this
17 paragraph, "United States Claims" shall mean Class 4B Utility General Unsecured Claims of the
18 United States that are identified by claim number and amount in a writing filed with this Court and
19 served on the Reorganized Debtors on or before December 4, 2020.

20 5. This Court shall retain jurisdiction to hear and determine all matters arising from or
21 related to the implementation, interpretation, or enforcement of this Order.

22 ** END OF ORDER **
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